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USDOC FOR 532/OEA/MHAMES/LRITTER
USDOC FOR 3150/USFCS/OIO/CEENIS/MCOSTA
USDOC FOR 532/OEE/MO'BRIEN
USDOC FOR 532/BIS/OEA/TWILLIS/EHOLLAND/ANALYST

E.O. 12958: N/A

TAGS: BEXP ETRD ETTC RS

SUBJECT: EXTRANCHECK: POST-SHIPMENT VERIFICATION: KLIOINVEST, INC.,
MOSCOW, RUSSIA. (End-user: Ural Electro-Chemical Integrated Plant)

REFTEL: E-MAIL #207007 DATED 3/25/2009

¶1. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. Reftel requested a post-shipment verification to determine the legitimacy and reliability of the end-user, Klioninvest Inc., Moscow, Russia. The company is listed on BIS license application: D377190 as the ultimate consignee of one (1) GC2518 germanium coaxial detector, and one (1) CP-5SL slimline cry-pulse 5. These items are controlled for anti-terrorism reasons under ECCN 1A999. The licensee is Canberra Industries, Inc., 800 Research Parkway, CT 06450.

¶3. On April 7, 2009, Export Control Attach Peter Liston and LES Natalya Shipitsina conducted the requested post-shipment verification at the offices of Klioninvest, Inc., 1-st Magistralny tupik, bld.11, Moscow, Russia. The export control team met with Valery Fedichkin, General Director, and Alexander Eruslanov, Chief Executive Officer.

¶4. As per the instructions in reftel, the end use check was conducted on Klioninvest, Inc., the purchaser listed in reftel, not the ultimate end user of the commodity. Therefore, the export control team was not able to visually inspect the reftel commodity.

¶5. Valery Fedichkin, General Director of Klioninvest, Inc. told the export control team that he purchased Klioninvest, Inc. approximately 10 years ago. Fedichkin advised the export control team that it was easier to purchase a pre-existing company at that time in Russia than to go through the bureaucratic obstacles within the Russian system of setting up a new business. Fedichkin stated that Klioninvest is a closed joint stock company, and it employs approximately 150 people. Fedichkin told the export control team that he did create a second company, called Kliogroup.

¶6. Fedichkin advised the export control team that Klioninvest and Kliogroup are not end users of the technology they purchase. He stated that they act as buyers for clients in Russia and the CIS countries in securing technology, obtaining the necessary import licenses from the Russian government and facilitating the customs clearance process.

¶7. Fedichkin told the export control team that he is very knowledgeable of the U.S. export laws, and stated that he and his company imported the first PC from the United States that went into the Mir Space Station in 1989. He stated that the licensing process was a logistical nightmare, but a great learning process.

¶8. Fedichkin told the export control team that the commodity in reftel was purchased by Klioninvest from Canberra Industries, Inc. in the U.S. for Canberra Moscow, a wholly-owned subsidiary of Canberra Industries, Inc. Fedichkin stated that Canberra Moscow received the reftel commodities after customs clearance. Canberra Moscow then

add its own software to the reftel commodities if necessary before shipping it to the State owned unitary enterprise Ural Electro-Chemical Integrated Plant, the ultimate end user located in Novouralsk, Russia. The export control team did not verify that the reftel commodity is at the Ural Electro-Chemical Integrated Plant.

¶9. Fedichkin stated that he has been doing business with Canberra Moscow for approximately 10 years. The General Director of the Canberra Moscow office is Oleg Toritsyn, telephone number: +7-495-429-6611.

¶10. Fedichkin also stated that he has been a long time distributor for the U.S. companies Andrews Corporation and Comscope.

¶11. The export control team found no indications of impropriety at Klioninvest, Inc. and did not find Valery Fedichkin, General Director of Klioninvest, Inc. evasive when answering the ECO's questions.

¶12. Recommendations: Post advises that there is additional information which was provided by another agency which should be considered when making a final license determination.

(FCS MOSCOW/JMARKS/PLISTON)

RUBIN